

1 LEONARDO M. RAPADAS  
2 United States Attorney  
3 MARIVIC P. DAVID  
4 Assistant U.S. Attorney  
5 Suite 500, Sirena Plaza  
6 108 Hernan Cortes  
7 Hagåtña, Guam 96910  
8 Telephone: (671) 472-7332/7283  
9 Telecopier: (671) 472-7334/7215  
10  
11 Attorneys for United States of America

12 **IN THE UNITED STATES DISTRICT COURT**  
13 **FOR THE TERRITORY OF GUAM**

14 UNITED STATES OF AMERICA, ) CRIMINAL CASE NO. 08-00018  
15 )  
16 Plaintiff, )  
17 )  
18 vs. ) **UNITED STATES'**  
19 ) **EXHIBIT LIST**  
20 )  
21 ERNESTO PAGLICAWAN VERDERA and )  
22 MARK ANTHONY BARTOLOME, )  
23 )  
24 Defendants. )  
25 )  
26 )  
27 )  
28 )

29 COMES NOW the United States and hereby files with the Court the following proposed  
30 exhibits to be introduced in its case in chief.

31 Respectfully submitted this 18<sup>th</sup> day of April 2008.

32 LEONARDO M. RAPADAS  
33 United States Attorney  
34 Districts of Guam and CNMI

35 By: /s/Marivic P. David  
36 MARIVIC P. DAVID  
37 Assistant U.S. Attorney  
38

**UNITED STATES' EXHIBIT LIST**

<b><u>NO</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>Date Identified</u></b>	<b><u>Admitted</u></b>
1.	German passport of E. Verdera	_____	_____
2.	Boarding pass and Electronic ticket stub of E. Verdera	_____	_____
3.	Philippine Airlines passenger itinerary/receipt of E. Verdera	_____	_____
4.	United States passport of M. Bartolome	_____	_____
5.	Boarding pass and Electronic ticket stub of M. Bartolome	_____	_____
6.	Philippine Airlines passenger itinerary/receipt of M. Bartolome	_____	_____
7.	Nine Philippine Airlines baggage claim checks	_____	_____
8.	Photo of assortment of baggage and bags; and one cardboard box	_____	_____
9.	One Home Depot box w/ tag #149058	_____	_____
10.	False bottom materials of cardboard, carbon paper, gray tape from Exhibit 9	_____	_____
11.	Photo of Home Depot box (side view and partial contents)	_____	_____
12.	Photo of Home Depot box (top view and partial contents)	_____	_____
13.	Photo of Home Depot box (top view and false bottom)	_____	_____
14.	Yellow and Red plastic bag w/ paraphernalia (glass pipes)	_____	_____
15.	Photo of Yellow and Red plastic bag	_____	_____
16.	Photo of Yellow and Red plastic bag w/ paraphernalia (glass pipes)	_____	_____
17.	Yellow plastic zippered bag w/ paraphernalia (cracked glass pipes)	_____	_____

<b><u>NO</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>Date Identified</u></b>	<b><u>Admitted</u></b>
18.	Photo of Yellow plastic zippered bag w/ paraphernalia (cracked glass pipes)	_____	_____
19.	Photo of Yellow plastic zippered bag w/ paraphernalia (cracked glass pipes) on top of newspaper page	_____	_____
20.	Photo of cracked glass pipes on top of newspaper page	_____	_____
21.	Black and Blue Columbia 300 bag	_____	_____
22.	Photo of Black and Blue Columbia 300 bag	_____	_____
23.	Photo of Black and Blue Columbia 300 bag w/ two glass pipes, blue bubble wrap, gray tape	_____	_____
24.	Digital Mini CD Scale	_____	_____
25.	Photo of Digital Mini CD Scale case	_____	_____
26.	Photo of Digital Mini CD Scale	_____	_____
27.	Red Sports Plus Bag	_____	_____
28.	Photo of Red Sports Plus Bag	_____	_____
29.	Photo of Red Feather carbon paper package	_____	_____
30.	Photo of TSA tray and contents secured in plastic; partial view of U.S. cash	_____	_____
31.	Photo of TSA tray and contents; partial view of U.S. cash; cardboard bottoms	_____	_____
32.	Photo of TSA tray and contents; partial view of U.S. cash; carbon wrapped container	_____	_____
33.	Photo of U.S. cash bundles (\$234,330) in TSA tray	_____	_____
34.	Photo of U.S. cash bundles (\$234,330) on carpet	_____	_____
35.	Blue Concourse Luggage w/ tag #149057	_____	_____
36.	False bottom materials of cardboard, carbon paper, black tape from Exhibit 35	_____	_____

<u>NO</u>	<u>DESCRIPTION</u>	<u>Date Identified</u>	<u>Admitted</u>
37.	Photo of Blue Concourse Luggage	_____	_____
38.	Photo of luggage handle w/ tag #149057	_____	_____
39.	Photo of Macy's bag w/ carbon paper	_____	_____
40.	Photo of crystal methamphetamine in bag w/ glass pipe	_____	_____
41.	Photo of crystal methamphetamine in bag on digital scale	_____	_____
42.	Photo of crystal methamphetamine in bag w/ field test kit	_____	_____
43.	Photo of one Heelys brand shoe w/ contents	_____	_____
44.	Photo of padded envelope listing Mr. Boy Revira	_____	_____
45.	Photo of rolled contents of padded envelope next to one Heelys brand shoe	_____	_____
46.	Photo of U.S. cash bundle next to one Heelys brand shoe	_____	_____
47.	Photo of padded envelope listing Mr. Boy Revira and U.S. cash bundles (\$7,021)	_____	_____
48.	Photo of open view of Blue Concourse Luggage w/ partial contents	_____	_____
49.	Photo of yellow padding in Blue Concourse Luggage	_____	_____
50.	Photo of bubble wrap; dryer sheets in Blue Concourse Luggage	_____	_____
51.	Photo of false bottom of Blue Concourse Luggage	_____	_____
52.	Photo of U.S. cash bundles (partial view) in Blue Concourse Luggage	_____	_____
53.	Photo of U.S. cash bundles (\$222,020) in Blue Concourse Luggage	_____	_____

<b><u>NO</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>Date Identified</u></b>	<b><u>Admitted</u></b>
54.	Photo of U.S. cash bundles (\$222,020) on carpet	_____	_____
55.	Black American Tourister Luggage w/ tag #149052	_____	_____
56.	False bottom materials of cardboard, carbon paper, black tape from Exhibit 55	_____	_____
57.	Photo of luggage handle w/ tag #149052	_____	_____
58.	Photo of outer side pocket and contents of Black American Tourister Luggage	_____	_____
59.	Photo of one box cutter, five lighters in Black American Tourister Luggage	_____	_____
60.	Photo of Sort Kwik fingertip moistener	_____	_____
61.	Photo of bottom of Black American Tourister Luggage	_____	_____
62.	Photo of towels in Black American Tourister Luggage	_____	_____
63.	Photo of yellow padding in Black American Tourister Luggage	_____	_____
64.	Photo of false bottom of Black American Tourister Luggage	_____	_____
65.	Photo of U.S. cash bundles (partial view) in Black American Tourister Luggage	_____	_____
66.	Photo of U.S. cash bundles (\$113,130) in Black American Tourister Luggage	_____	_____
67.	Photo of U.S. cash bundles (\$113,130) on carpet	_____	_____
68.	Blue Concourse Luggage w/ tag #149054	_____	_____
69.	False bottom materials of cardboard, carbon paper, black tape from Exhibit 68	_____	_____
70.	Photo of luggage handle w/ tag #149054	_____	_____
71.	Photo of Blue Concourse Luggage w/ tag #149054	_____	_____

<b><u>NO</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>Date Identified</u></b>	<b><u>Admitted</u></b>
72.	Photo of glass pipes, bubble wrap	_____	_____
73.	Photo of yellow padding, bubble wrap in Blue Concourse Luggage	_____	_____
74.	Photo of bubble wrap in Blue Concourse Luggage	_____	_____
75.	Photo of false bottom in Blue Concourse Luggage	_____	_____
76.	Photo of U.S. cash bundles (\$120,180) in Blue Concourse Luggage	_____	_____
77.	Photo of U.S. cash bundles (\$120,180) on carpet	_____	_____
78.	Brown Replay Leather Bag w/ tag #149053	_____	_____
79.	False bottom materials of cardboard, carbon paper, clear plastic, gray and black tape from Exhibit 78	_____	_____
80.	Photo of bag handle w/ tag #149053	_____	_____
81.	Photo of Replay bag (top view)	_____	_____
82.	Photo of Replay brand	_____	_____
83.	Photo of false bottom of Replay bag	_____	_____
84.	Photo of bottom of Replay bag; (partial stitching removed)	_____	_____
85.	Photo of false bottom of Replay bag, (partial view of taped cardboard)	_____	_____
86.	Photo of partial view of U.S. cash bundles in Replay bag	_____	_____
87.	Photo of false bottom of Replay bag, (full view of taped cardboard)	_____	_____
88.	Photo of U.S. cash bundles (\$113,950) in Replay bag	_____	_____
89.	Photo of false bottom materials in Replay bag	_____	_____

<u>NO</u>	<u>DESCRIPTION</u>	<u>Date Identified</u>	<u>Admitted</u>
90.	Photo of U.S. cash bundles (\$113,950) on carpet	_____	_____
91.	Black Compass bag w/ tag #149055	_____	_____
92.	Photo of bag handle w/ tag #149055	_____	_____
93.	Photo of Compass brand	_____	_____
94.	Photo of open box w/ M-500 Digital Pocket Scale and Durex condom box	_____	_____
95.	M-500 Digital Pocket Scale	_____	_____
96.	Photo of Durex condom box and bag of crystal methamphetamine	_____	_____
97.	Photo of Durex condom box, bag of crystal methamphetamine and field test kit	_____	_____
98.	Drug Exhibit No. 1 (1.2 grams of d-Methamphetamine HCl)	_____	_____
99.	Drug Exhibit No. 2 (.13 gram of d-Methamphetamine HCl)	_____	_____
100.	DEA lab report w/ Form 7	_____	_____
101.	First Hawaiian Bank Check of \$810,631.00, and Customer Receipt	_____	_____
102.	Photo of Continental Airlines check-in counter	_____	_____
103.	Photo of Transportation of Currency notice by Continental Airlines check-in counter	_____	_____
104.	Photo of Philippine Airlines check-in counter	_____	_____
105.	Photo of Transportation of Currency notice by Philippine Airlines check-in counter	_____	_____
106.	Report of International Transportation of Currency or Monetary Instruments Form	_____	_____
107.	Statement of Rights Form	_____	_____
108.	Days Inn, Tamuning, Master Folio re E. Verdera (1/29/08 to 2/28/08)	_____	_____

<u>NO</u>	<u>DESCRIPTION</u>	<u>Date Identified</u>	<u>Admitted</u>
109.	Days Inn Hotel Guam, Barrigada re M. Bartolome (2/14/08 to 2/15/08)	_____	_____
110.	Three Receipts from Days Inn (Nos. 370781, 370782, 426858)	_____	_____
111.	One Receipt from Days Inn, No. 247628	_____	_____
112.	RCBC Savings Bank Passbook, Euro Account, Ernesto P. Verdera	_____	_____
113.	RCBC Savings Bank Passbook, Ernesto P. Verdera	_____	_____
114.	Western Union Gold card, Ernesto P. Verdera	_____	_____
115.	Western Union money transfer form for \$300 sent by Mark Bartolome w/ customer copy	_____	_____
116.	Western Union money transfer form for \$200 sent by Mark Bartolome	_____	_____
117.	Western Union money transfer form for \$250 sent by Mark Bartolome w/ final receipt	_____	_____
118.	Guam Customs/Agriculture Declaration Form of Verdera, stamped 10/28/07	_____	_____
119.	Guam Customs/Agriculture Declaration Form of Verdera, stamped 12/15/07	_____	_____
120.	Guam Customs/Agriculture Declaration Form of Verdera, stamped 12/28/07	_____	_____
121.	Guam Customs/Agriculture Declaration Form of Verdera, stamped 1/8/08	_____	_____
122.	Guam Customs/Agriculture Declaration Form of Verdera, stamped 1/29/08	_____	_____
123.	Guam Customs/Agriculture Declaration Form of Bartolome, stamped 12/15/07	_____	_____
124.	Guam Customs/Agriculture Declaration Form of Bartolome, stamped 12/28/07	_____	_____



<u>NO</u>	<u>DESCRIPTION</u>	<u>Date Identified</u>	<u>Admitted</u>
125.	Guam Customs/Agriculture Declaration Form of Bartolome, stamped 1/7/08	_____	_____
126.	Guam Customs/Agriculture Declaration Form of Bartolome, stamped 1/28/08	_____	_____